

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

City of Chicago,

Plaintiff,

v.

DoorDash, Inc. and Caviar, LLC,

Defendants.

Civil Action No. 1:21-cv-05162

Honorable Robert W. Gettleman

Oral Argument Requested

**DEFENDANTS' MOTION FOR
PARTIAL JUDGMENT ON THE PLEADINGS**

Defendants DoorDash, Inc. and Caviar, LLC (collectively, “Defendants”) hereby move, pursuant to Federal Rule of Civil Procedure 12(c), for partial judgment on the pleadings as to all claims made by Plaintiff City of Chicago for alleged violations of the Municipal Code of Chicago (“MCC”) that occurred before August 27, 2019.

As set forth in Defendants’ accompanying memorandum of law, Plaintiff’s claims arising from alleged violations of the MCC that occurred before August 27, 2019 are barred by laches, the applicable statute of limitations, and due process.

WHEREFORE, Defendants respectfully request that this Honorable Court grant Defendants partial judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c) on all claims arising from alleged violations of the MCC that occurred before August 27, 2019.

DATED: April 20, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2023, I caused the foregoing document to be electronically filed using the CM/ECF system, which will send notice of this filing to all counsel of record.

/s/ Michael K. Forde